EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

In re: NEURONTIN MARKETING,
SALES PRACTICES AND PRODUCTS
LIABILITY LITIGATION
_____/
THIS DOCUMENT RELATES TO: MDL Docket No. 1629
Bulger v. Pfizer, et al. Master File No. 04-10981
07-11426-PBS

Smith v. Pfizer, et al.
05-CV-11515-PBS
Crone v. California State Court
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The videotaped deposition of SHEILA WEISS SMITH, PH.D. was held on Monday, December 22, 2008, commencing at 9:17 A.M., at the Law Offices of Goodell, DeVries, Leech & Dann, LLP, 20th Floor Commerce Place, One South Street, Baltimore, Maryland 21202, before Ronda J. Thomas, a Notary Public.

Job No.: 183061
REPORTED BY: Ronda J. Thomas, RPR, CLR

A Not that I recall.
Q Safe to say you didn't participate in the development of any materials for such a meeting, correct?
A No.
Q Okay. Are you qualified to review the FDA's statistical analysis in the advisory committee transcript?
A Excuse me?
Q Do you believe that you are qualified to have reviewed the FDA statistical review in the advisory committee and render opinions?
A Absolutely. That's what I do for the FDA. I often sit on these type of advisory committees. I couldn't sit on this one because I had already been retained on this case.
Q Do you believe that you were qualified to do so in January when we took your deposition last?
A Excuse me?
Q Your qualifications to review this information, is that a new found qualification or is that something that you possessed back in January when we took your deposition last time?
A I believe I was qualified in January to sit on the advisory committee and review the materials.

Yes. I think I've been qualified for years to do so.

Q Were you asked by Pfizer to review those materials within January -- in the January timeframe right after it came out?

A I was provided by --

MR. BARNES: Answer the question.

A By Pfizer? Pfizer didn't -- I didn't directly talk to anyone at Pfizer about this case. Period.

Q Were you asked by counsel to review that FDA and render an opinion?

A They provided me with the alert and the information.

Q Did they ask you to do anything with it?

A Just to reread it.

Q When the statistical review -- when did you first see the FDA statistical review?

A When did I see it? When it was -- after it was made available to the public on their web site.

Q So you didn't see it before then?

A No, I only saw it when it was made available.

Q Do you know if Pfizer had that document before it was made publicly available?

A I'm not aware.

Q Were you asked to ever review it at that time?

MR. BARNES: What time?

Q At the time it became publicly available. When we're talking about the FDA statistical review?

A Was I asked to look at it? I think I had already looked at it as soon as it became available because I wanted to put the alert in January in context. So I was very interested in what they said.

Q When was the first time you were asked to put down on a piece of paper an opinion based upon the FDA alert?

MR. BARNES: Objection. We have a stipulation in this case where drafting of expert reports is not the subject of examination. So I'll instruct her not to answer that question.

MR. ALTMAN: I'm not asking about the drafting. I'm asking when she was asked to do it. That's not the drafting.

MR. BARNES: That's a different question.

MR. ALTMAN: I asked when was the first time you were asked to opine upon the FDA alert.

MR. BARNES: That's a different question. You may answer that one.

A I believe it was in early fall.

Q Okay. When was the first time you were asked to render any opinions on the advisory committee meeting and the transcript and the discussions that took place?

A I believe it was around the same time.

Q Have you ever had any direct discussions with Dr. Robert Gibbons?

A No.

Q Do you believe that you are -- you're aware that Dr. Gibbons did a pharmacoepidemiologic study of the pharmametrics data, correct?

A Yes, I'm aware of it.

Q If you had been given that raw data as he was, do you believe you could have done a similar study?

A Yes.

Q So you pretty much see yourself as kind of colleagues, same general qualifications?

A I consider us colleagues. He's a biostatistician and I'm an epidemiologist. We typically work together on teams.

Q We talked before about the AIRS G database in this case. Have you ever received similar data from a company in the past? What I mean by that a CD, et cetera, that has their adverse event database or an